



Entered on Docket  
January 28, 2011

Hon. Bruce A. Markell  
United States Bankruptcy Judge

ANDREW J URBAN JR (NSBN 440)

ANDREW J URBAN CHTD.

2580 Anthem Village Drive

Henderson, Nevada 89052

Telephone: (888) 702-6856

Facsimile: (877) 702-3329

E-mail: [andy@nevadavlo.com](mailto:andy@nevadavlo.com)

Attorney for Manny G. Gomez, P.E.

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

SOUTH EDGE, LLC, a Nevada Limited  
Liability Company

Alleged Debtor.

Case No. 10-32968 (BAM)

Chapter 11 (Involuntary)

**ORDER GRANTING MOTION FOR  
PROTECTIVE ORDER AS TO MANNY  
G. GOMEZ, P.E.**

The Motion of Manny G. Gomez, P.E. ("Gomez") pursuant to Fed. R. Civ. P. 45(c)(1), requesting a protective order to compensate Gomez for the burden or expense incurred related to his compliance with the subpoena served on behalf of JPMorgan Chase Bank N.A. ("JPMorgan") [DE 331], said motion having been properly served and JPMorgan having filed its Notice of No Objection [DE 346], and good cause appearing, the Court makes its Order as follows:

ORDERED:

The Motion is Granted; and

JPMorgan, as the party who served a subpoena upon Gomez, is directed to compensate Gomez for the burden or expense incurred related to his compliance with the subpoena.

###

1 Prepared and Submitted By:

2 /s/ Andrew J. Urban Jr.

3 ANDREW J URBAN JR (NSBN 440)

4 ANDREW J URBAN CHTD.

5 2580 Anthem Village Drive

6 Henderson, Nevada 89052

7 Telephone: (888) 702-6856

8 Facsimile: (877) 702-3329

9 E-mail: andy@nevadavlo.com

10 Attorney for Manny G. Gomez, P.E.

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**DECLARATION OF ANDREW J. URBAN JR. ESQ. FOR APPROVAL PURSUANT TO  
LOCAL RULE 9021(D)**

I, Andrew J. Urban Jr. Esq., declare pursuant to 28 U.S.C. § 1746, as follows:

1. I submit this Declaration in support of the proposed Protective Order requested by Movant, Manny G. Gomez, P.E. in his Motion for Protective Order [DE 331] filed on January 22, 2011 for relief from the burden and expense of his compliance with the subpoena issued by JP Morgan Chase Bank, N.A. for his appearance and testimony at the hearing set for 9:30 AM on February 2, 2011.

2. A hearing on the Motion is not necessary as I discussed the proposed motion and relief Movant would be requesting under Fed. R. Civ. P. 45(c)(1) with counsel for JP Morgan Chase Bank, N.A. and the parties agreed that JP Morgan Chase Bank was not opposed to the relief Movant was seeking. Further, no other parties to this case are impacted by the relief sought in the Motion for Protective Order other than the party issuing the subpoena, JP Morgan Chase Bank, N.A and the Movant, Manny G. Gomez, P.E.

3. Notice of the Motion was served by Notice of Electronic Filing by the ECF System on January 22, 2011, see Exhibit A attached. I also served a copy of the Motion by direct email as opposed to through the ECF System to the persons listed on Exhibit B attached. As evidenced by the Certificate of Service filed January 22, 2011 [DE 339].

4. I have not received any objections to the motion nor do I know of any objections to the requested relief as of the date this proposed order was submitted.

5. Further, on January 23, 2011, JP Morgan Chase Bank, N.A. filed its Notice of No Objection to the Motion for Protective Order [DE 346].

I declare under penalty of perjury that the foregoing is true and correct. Executed this 27<sup>th</sup> day of January, 2011 at Henderson, Nevada.

Andrew J. Urban

Andrew J. Urban Jr., Esq.

# EXHIBIT A

**From:** USBC\_NEVADA@nvb.uscourts.gov <USBC\_NEVADA@nvb.uscourts.gov>  
**Subject:** 10-32968-bam Motion for Protective Order  
**Date:** Sat, 22 Jan 2011 15:26:32 -0800  
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**BCC:**

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**U.S. Bankruptcy Court**

**District of Nevada**

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**Case Name:** SOUTH EDGE, LLC

**Case Number:** 10-32968-bam

**Document Number:** 331

**Docket Text:**

Motion for Protective Order Filed by ANDREW J URBAN JR on behalf of Manny G. Gomez (URBAN, ANDREW)

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[STAMP bkecfStamp\_ID=989277954 [Date=1/22/2011] [FileNumber=18383337-0] [0c187643200cd33003e7bd76a9ce29848d703fe4f0e239c35b0845f298a71ef0eb619b21984ff1dd3dc2aa6b6ee652f8a451fefd80345a616d56b64b5cccd684]]

**10-32968-bam Notice will be electronically mailed to:**

MARTIN R BARASH on behalf of Alleged Debtor SOUTH EDGE, LLC  
mbarash@ktbslaw.com

ROBERT J. BERENS on behalf of Creditor MERCHANTS BONDING COMPANY  
rberens@mbwlaw.com, amelton@mbwlaw.com, charrington@mbwlaw.com, khall@mbwlaw.com

I SCOTT BOGATZ on behalf of Interested Party FOCUS SOUTH GROUP, LLC  
rpoll@isbnv.com

ROBERT M. CHARLES on behalf of Alleged Debtor SOUTH EDGE, LLC  
rcharles@lrlaw.com, cjordan@lrlaw.com

DAVID A. COLVIN on behalf of Creditor Essex Real Estate Partners, LLC  
dcolvin@marquisurbach.com,

mwalters@marquisurbach.com;kgallegos@marquisurbach.com;tszostek@marquisurbach.com

NATALIE M. COX on behalf of Creditor CITY OF HENDERSON  
ncox@klnevada.com, bankruptcy@klnevada.com;awhite@klnevada.com;kgregos@klnevada.com

LAUREL E. DAVIS on behalf of Interested Party MERITAGE HOMES OF NV  
ldavis@fclaw.com, mhurtado@fclaw.com

GREGORY E GARMAN on behalf of Interested Party BEAZER HOMES HOLDING CORP.  
bankruptcynotices@gordonsilver.com, bknotices@gordonsilver.com

KEVIN R. HANSEN on behalf of Creditor C&S Company, Inc.  
kevin@shumwayvan.com

MATTHEW C. HEYN on behalf of Alleged Debtor SOUTH EDGE, LLC  
mheyn@ktbslaw.com

BRIAN E HOLTHUS on behalf of Petitioning Creditor CREDIT AGRICOLE CORPORATE AND INVESTMENT BANK  
bankruptcy@juww.com

NILE LEATHAM on behalf of Creditor CITY OF HENDERSON  
nleatham@klnevada.com, ckishi@klnevada.com;bankruptcy@klnevada.com

PAT LUNDVALL on behalf of Interested Party PARDEE HOMES OF NEVADA  
lundvall@mcdonaldcarano.com, ahallmark@mcdonaldcarano.com;ebarnwell@mcdonaldcarano.com

ROBERT J. PFISTER on behalf of Alleged Debtor SOUTH EDGE, LLC  
rpfister@ktbslaw.com

CHRISTINE A ROBERTS on behalf of Creditor Lexon Surety Group  
roberts@sullivanhill.com,  
hill@sullivanhill.com;vidovich@sullivanhill.com;mcallister@sullivanhill.com;stephens@sullivanhill.com;stein@sullivanhill.com

SAMUEL A. SCHWARTZ on behalf of Alleged Debtor SOUTH EDGE, LLC  
sam@schwartzlawyers.com, ecf@schwartzlawyers.com;schwartzecf@gmail.com

U.S. TRUSTEE - LV - 11  
USTPRegion17.lv.ecf@usdoj.gov

ANDREW J URBAN on behalf of Witness Manny Gomez  
andy@nevadavlo.com, ajurban@cox.net

TYLER N. URE on behalf of Petitioning Creditor CREDIT AGRICOLE CORPORATE AND INVESTMENT BANK  
bankruptcy@juww.com

MICHAEL C. VAN on behalf of Creditor C&S Company, Inc.  
michael@shumwayvan.com,  
sandy@shumwayvan.com;erica@shumwayvan.com;ashley@shumwayvan.com;douglas@shumwayvan.com

**10-32968-bam Notice will not be electronically mailed to:**

CHARLES A. BECKHAM on behalf of Petitioning Creditor CREDIT AGRICOLE CORPORATE AND INVESTMENT BANK  
1221 MCKINNEY, STE 2100  
HOUSTON, TX 77010

CHRISTOPHER L. CASTILLO on behalf of Petitioning Creditor CREDIT AGRICOLE CORPORATE AND INVESTMENT BANK  
1221 MCKINNEY, STE 2100  
HOUSTON, TX 77010

G. LARRY ENGEL on behalf of Petitioning Creditor JPMORGAN CHASE BANK, N.A.  
425 MARKET STREET  
SAN FRANCISCO, CA 94105

BRENT C GARDNER on behalf of Petitioning Creditor JPMORGAN CHASE BANK, N.A.  
40 N CENTRAL AVE  
PHOENIX, AZ 85004-4429

HAYNES AND BOONE LLP on behalf of Petitioning Creditor CREDIT AGRICOLE CORPORATE AND INVESTMENT BANK  
ONE HOUSTON CENTER  
1221 MCKINNEY ST, STE 2100  
HOUSTON, TX 77010

KRISTIN A. HIENSCH on behalf of Petitioning Creditor JPMORGAN CHASE BANK, N.A.  
MORRISON AND FOERSTER LLP  
425 MARKET STREET  
SAN FRANCISCO, CA 94105

WHITMAN L. HOLT on behalf of Alleged Debtor SOUTH EDGE, LLC  
KLEE, TUCHIN, BOGDANOFF AND STERN LLP  
1999 AVENUE OF THE STARS, 39TH FLOOR  
LOS ANGELES, CA 90067

JAMES E. HOUGH on behalf of Petitioning Creditor JPMORGAN CHASE BANK, N.A.  
MORRISON AND FOERSTER LLP  
1290 AVENUE OF THE AMERICAS  
NEW YORK, NY 10104

JOLLEY URGA WIRTH WOODBURY & STANDISH on behalf of Petitioning Creditor CREDIT AGRICOLE CORPORATE AND INVESTMENT BANK  
3800 HOWARD HUGHES PKWY #1600  
LAS VEGAS, NV 89109

JAMIE A LEVITT on behalf of Petitioning Creditor JPMORGAN CHASE BANK, N.A.  
MORRISON & FOERSTER LLP  
1290 AVENUE OF THE AMERICAS  
NEW YORK, NY 10104-0050

NORMAN S. ROSENBAUM on behalf of Petitioning Creditor JPMORGAN CHASE BANK, N.A.  
MORRISON AND FOERSTER LLP  
1290 AVENUE OF THE AMERICAS  
NEW YORK, NY 10104

DAVID M. STERN on behalf of Alleged Debtor SOUTH EDGE, LLC  
KLEE, TUCHIN, BOGDANOFF AND STERN LLP  
1999 AVENUE OF THE STARS, 39TH FLOOR  
LOS ANGELES, CA 90067

DAMION K. L. STODOLA on behalf of Petitioning Creditor JPMORGAN CHASE BANK, N.A.  
MORRISON AND FOERSTER LLP

1290 AVENUE OF THE AMERICAS  
NEW YORK, NY 10104

JORDAN A. WISHNEW on behalf of Petitioning Creditor JPMORGAN CHASE BANK, N.A.  
MORRISON & FOERSTER LLP  
1290 AVENUE OF THE AMERICAS  
NEW YORK, NY 10104

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# EXHIBIT B

Mailing list for Motion for Protective Order  
**Manny G. Gomez Motion for Protective Order (#331)**  
 January 22, 2011

Name	Email Address
Wishnew, Jordan	<a href="mailto:JWishnew@mofo.com">JWishnew@mofo.com</a>
V. Bergelson	<a href="mailto:vbergelson@mofo.com">vbergelson@mofo.com</a>
Tyler N. Ure	<a href="mailto:tnu@juww.com">tnu@juww.com</a>
Stodola, Damion L.	<a href="mailto:DStodola@mofo.com">DStodola@mofo.com</a>
sandy@shumwayvan.com	<a href="mailto:sandy@shumwayvan.com">sandy@shumwayvan.com</a>
Samuel A. Schwartz	<a href="mailto:sam@schwartzlawyers.com">sam@schwartzlawyers.com</a>
Rosenbaum, Norman S.	<a href="mailto:Nrosenbaum@mofo.com">Nrosenbaum@mofo.com</a>
Robert Kampfner	<a href="mailto:rkampfner@la.whitecase.com">rkampfner@la.whitecase.com</a>
Robert J. Berens	<a href="mailto:rberens@mbwlaw.com">rberens@mbwlaw.com</a>
Pat Lundvall	<a href="mailto:plundvall@mcdonaldcarano.com">plundvall@mcdonaldcarano.com</a>
Nile Leatham	<a href="mailto:nleatham@klnevada.com">nleatham@klnevada.com</a>
Natalie M. Cox	<a href="mailto:ncox@klnevada.com">ncox@klnevada.com</a>
Moloff, Leda A.	<a href="mailto:LMoloff@mofo.com">LMoloff@mofo.com</a>
Michael C. Van	<a href="mailto:michael@shumwayvan.com">michael@shumwayvan.com</a>
<a href="mailto:mhurtado@fclaw.com">mhurtado@fclaw.com</a>	<a href="mailto:mhurtado@fclaw.com">mhurtado@fclaw.com</a>
Matthew C. Heyn	<a href="mailto:mheyen@ktbslaw.com">mheyen@ktbslaw.com</a>
Martin R. Barash	<a href="mailto:mbarash@ktbslaw.com">mbarash@ktbslaw.com</a>
<a href="mailto:lundvall@mcdonaldcarano.com">lundvall@mcdonaldcarano.com</a>	<a href="mailto:lundvall@mcdonaldcarano.com">lundvall@mcdonaldcarano.com</a>
Levitt, Jamie A.	<a href="mailto:JLevitt@mofo.com">JLevitt@mofo.com</a>
Laurel E. Davis	<a href="mailto:ldavis@fclaw.com">ldavis@fclaw.com</a>
Kline, John T.	<a href="mailto:JKline@mofo.com">JKline@mofo.com</a>
<a href="mailto:khall@mbwlaw.com">khall@mbwlaw.com</a>	<a href="mailto:khall@mbwlaw.com">khall@mbwlaw.com</a>
Kevin R. Hansen	<a href="mailto:kevin@shumwayvan.com">kevin@shumwayvan.com</a>
Keeton, Douglas Ronald	<a href="mailto:DKeeton@mofo.com">DKeeton@mofo.com</a>
Joshua Keesan	<a href="mailto:joshua.keesan@la.whitecase.com">joshua.keesan@la.whitecase.com</a>
I. Scott Bogatz	<a href="mailto:rpoll@isbny.com">rpoll@isbny.com</a>
Hough, James E.	<a href="mailto:JHough@mofo.com">JHough@mofo.com</a>
Hiensch, Kristin A.	<a href="mailto:KHiensch@mofo.com">KHiensch@mofo.com</a>
Greg Garman	<a href="mailto:geg@gordonsilver.com">geg@gordonsilver.com</a>
<a href="mailto:Erica@shumwayvan.com">Erica@shumwayvan.com</a>	<a href="mailto:Erica@shumwayvan.com">Erica@shumwayvan.com</a>
Engel, Larry	<a href="mailto:LEngel@mofo.com">LEngel@mofo.com</a>
Elliot R. Eisner	<a href="mailto:eeisner@klnevada.com">eeisner@klnevada.com</a>
Edelstein, Mark S.	<a href="mailto:MEdelstein@mofo.com">MEdelstein@mofo.com</a>
<a href="mailto:ecf@schwartzlawyers.com">ecf@schwartzlawyers.com</a>	<a href="mailto:ecf@schwartzlawyers.com">ecf@schwartzlawyers.com</a>
<a href="mailto:dlattin@mclrenolaw.com">dlattin@mclrenolaw.com</a>	<a href="mailto:dlattin@mclrenolaw.com">dlattin@mclrenolaw.com</a>
David M. Stern	<a href="mailto:dstern@ktbslaw.com">dstern@ktbslaw.com</a>
<a href="mailto:ckishi@klnevada.com">ckishi@klnevada.com</a>	<a href="mailto:ckishi@klnevada.com">ckishi@klnevada.com</a>
Christopher L. Castillo	<a href="mailto:christopher.castillo@haynesboone.com">christopher.castillo@haynesboone.com</a>
<a href="mailto:charrington@mbwlaw.com">charrington@mbwlaw.com</a>	<a href="mailto:charrington@mbwlaw.com">charrington@mbwlaw.com</a>

Mailing list for Motion for Protective Order  
**Manny G. Gomez Motion for Protective Order (#331)**  
January 22, 2011

Charles Vlasic	cvlasic@isbnv.com
Charles A. Beckham	charles.beckham@haynesboone.com
Bryan Merryman	bmerryman@la.whitecase.com
Bryan A. Lindsey	bryan@schwartzlawyers.com
brucevandalsem@quinnemanuel.com	brucevandalsem@quinnemanuel.com
Brian E. Holthus	beh@juww.com
bankruptcy@klnevada.com	bankruptcy@klnevada.com
bankruptcy@juww.com	bankruptcy@juww.com
August B. Landis	augie.landis@usdoj.gov
ashley@shumwayvan.com	ashley@shumwayvan.com
amelton@mbwlaw.com	amelton@mbwlaw.com
ahallmark@mcdonaldcarano.com	ahallmark@mcdonaldcarano.com